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10 *Attorneys for Defendant The State of Nevada,  
ex rel. its Department of Corrections*

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 DONALD WALDEN JR, NATHAN  
14 ECHEVERRIA, AARON DICUS, BRENT  
15 EVERIST, TRAVIS ZUFELT, TIMOTHY  
RIDENOUR, and DANIEL TRACY on behalf  
16 of themselves and all others similarly situated,

17 Plaintiffs,

18 v.

19 THE STATE OF NEVADA, *EX REL.* ITS  
20 NEVADA DEPARTMENT OF  
CORRECTIONS, and DOES 1-50,

21 Defendants.

22 Case No.: 3:14-cv-00320-MMD-WGC

23 **STIPULATION FOR ENLARGEMENT  
OF TIME FOR RESPONSIVE  
PLEADINGS AND [PROPOSED] ORDER  
THEREON**

24 **(First Request)**

25 Plaintiffs DONALD WALDEN JR., NATHAN ECHEVERRIA, AARON DICUS,  
BRENT EVERIST, TRAVIS ZUFELT, TIMOTHY RIDENOUR, and DANIEL TRACY on  
behalf of themselves and all other similarly situated, and Defendant STATE OF NEVADA, *EX.*  
*REL.* ITS DEPARTMENT OF CORRECTIONS (collectively “The Parties), by and through their  
respective counsel of record, hereby stipulate and agree to extend the time for both Parties to file  
their respective responsive pleadings as set forth below.

1        This stipulation is submitted in compliance with LR IA 6-1. The Parties are requesting  
2        these extension due to the volume of motions pending, the complexity and fact intensive nature  
3        of the responsive pleadings, counsels' professional commitments, existing workload, and  
4        challenges of working remotely due to the COVID-19 crisis, including slower connectivity,  
5        communications delays, and obtaining records necessary to the motions. Good cause exists for  
6        the requested extensions.<sup>1</sup>

7        Accordingly, the Parties further stipulate and agree to extend the deadlines as follows:

8        1. Plaintiffs' Opposition to NDOC's Motion to Dismiss Claims of Non-  
9        Participating Plaintiffs (ECF No. 274) currently due 4/21/20 shall be extended one (1) calendar  
10       week to on or before **Tuesday, April 28, 2020**. Defendant's Reply In Support Of shall be due  
11       fourteen (14) calendar days after the filing of Plaintiffs' Opposition.

12       2. Plaintiffs' Opposition to NDOC's Motion to Decertify Collective Action (ECF  
13       No. 279) currently due 4/22/20 shall be extended one (1) calendar week to on or before  
14       **Wednesday, April 29, 2020**. Defendant's Reply In Support Of shall be due twenty-one (21)  
15       calendar days after the filing of Plaintiffs' Opposition.

16       3. Plaintiffs' Opposition to NDOC's Motion to Exclude Evidence from Plaintiffs'  
17       Expert ERC (ECF No. 282) currently due 4/22/20 shall be extended two (2) calendar weeks to  
18       on or before **Wednesday May 6, 2020**. Defendant's Reply In Support Of shall be due fourteen  
19       (14) calendar days after the filing of Plaintiffs' Opposition.

20       4. Plaintiffs' Opposition to NDOC's Motion for Summary Judgment on Sovereign  
21       Immunity (ECF No. 276) currently due 4/29/20 shall be extended two (2) calendar weeks to on  
22       or before **Wednesday, May 13, 2020**. Defendant's Reply In Support Of shall be due fourteen  
23       (14) calendar days after the filing of Plaintiffs' Opposition.

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27       <sup>1</sup> The Parties do not request extension for: (1) Plaintiffs' Reply in Support of Plaintiffs' Motion  
28       for Partial Summary Judgment, due 4/20/20, and (2) Plaintiffs' Opposition to NDOC's Motion  
      for Summary Judgment on the Statute of Limitations (ECF No. 280) due on 4/29/20.

1           5. Plaintiffs' Opposition to NDOC's Motion for Summary Judgment on the Merits  
2 of Plaintiffs FLSA Claims (ECF No. 283) currently due 4/29/20 shall be extended three (3)  
3 calendar weeks to on or before **Wednesday, May 20, 2020**. Defendant's Reply In Support Of  
4 shall be due fourteen (14) calendar days after the filing of Plaintiffs' Opposition.

5           The Parties agree that the requested extension furthers the interest of this litigation and is  
6 not being requested in bad faith or to delay these proceedings unnecessarily.  
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8           IT IS SO STIPULATED.  
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10          Dated: April 9, 2020.  
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12          THIERMAN BUCK LLP  
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15          */s/Joshua D. Buck*  
16          Mark R. Thierman, Esq., Bar No. 8285  
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24          *Attorneys for Plaintiffs*  
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26          Dated: April 9, 2020.  
27

28          WILSON ELSER MOSKOWITZ,  
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4          */s/James T Tucker*  
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10         *Attorneys for Defendants*  
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12           **ORDER**  
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14           **IT IS SO ORDERED.**  
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16          Dated this 13th day of April, 2020.  
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21          U.S. District/Magistrate Judge  
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